

October 6, 2006

Ms. Rosa G. Lewis
Campaign Finance Analyst
Reports Analysis Division
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Ms. Lewis:

Straight Talk America (FEC ID# C00413245) is in receipt of your letter dated September 8, 2006, concerning our 2006 July monthly FEC report.

The payment you reference to The Dennehy Group on 6/15/06 in the amount of \$11,998.90 is not an administrative expense but was for travel expense incurred by this unincorporated business that provides political consulting services to the Committee. These travel expenses occurred in the normal course of business for this firm, in accordance with 11 CFR 116.3. The travel expenses were incurred between April 25 and May 6, billed in June and paid in June, in a commercially reasonable timeframe. Therefore, there is no in-kind contribution with respect to this expense.

The payment you reference to The Eudy Company on 6/15/06 in the amount of \$1,432.15 is similarly not an administrative expense but was also for travel expenses incurred by this consulting vendor that provides fundraising consulting services to the Committee. These travel expenses occurred in the normal course of business for this firm, in accordance with 11 CFR 116.3. The travel expenses were incurred between May 9 and May 15, billed in June and paid in June, in a commercially reasonable timeframe. Therefore, there is no in-kind contribution with respect to this expense.

Finally, the Committee has as you indicated reviewed all reimbursements to individuals for travel and subsistence, and reviewed the reporting requirements outlined in the regulation you cited at 11 CFR 104.9. Through this response the Committee can as you requested confirm that no further itemization is required under any Commission regulation for these expenditures.

Sincerely:

Keith A. Davis, Treasurer
Straight Talk America